

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹
Debtors.

Chapter 11

Case No. 23-11069 (CTG)
(Jointly Administered)

Re: Docket Nos. 8156 & ____

**ORDER GRANTING MOTION OF MFN PARTNERS, LP AND
MOBILE STREET HOLDINGS, LLC TO MAINTAIN UNDER SEAL
CERTAIN EXHIBITS REGARDING THE FOURTH AMENDED JOINT
CHAPTER 11 PLAN OF YELLOW CORPORATION AND ITS DEBTOR
AFFILIATES PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE**

Upon consideration of the motion (the “Motion to Seal”)² of MFN Partners, LP (“MFN”), Mobile Street Holdings, LLC (“Mobile Street” and together with MFN, the “MFN Parties”) for entry of an order (this “Order”) pursuant to section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, authorizing the MFN Parties to maintain Confidential Exhibits under seal; and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and the Court having found that this is a core proceeding under 28 U.S.C. § 157(b)(2), and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion to Seal is in the best interests of the parties in interest; and the Court having found that

¹ A complete list of each of the debtors in these chapter 11 cases (the “Debtors”) may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion to Seal.

notice of the Motion to Seal was appropriate under the circumstances, and no other or further notice need be provided; and the Court having reviewed and considered the Motion to Seal; and the Court having determined that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED as set forth in this Order:
2. Pursuant to section 107(b) of the Bankruptcy Code and Local Rule 9018-1, the MFN Parties are authorized to maintain under seal the Confidential Exhibits.
3. The Confidential Exhibits will be provided only to the Court, the Debtors, the U.S. Trustee, the Committee, and to others upon the agreement of the Committee or further order of the Court.
4. The MFN Parties are authorized to take any and all other actions necessary or appropriate to effectuate this Order.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.